IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327

MDL 2327

This document applies to:

 $\begin{array}{c} {\rm JOSEPH~R.~GOODWIN~U.S.~DISTRICT} \\ {\rm JUDGE} \end{array}$

ETHICON ELECTION WAVE CASES LISTED IN PLAINTIFFS' EXHIBIT A

NOTICE OF ADOPTION OF WAVE 8 DAUBERT RESPONSE REGARDING OZ HARMANLI, M.D. FOR ELECTION WAVE

Plaintiffs filed a Notice of Adoption (Dkt. 7285) as to the opinion testimony of Oz Harmanli, M.D., in the Election Wave cases identified in Exhibit A to their Notice. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general-causation opinions of Dr. Harmanli for Ethicon Wave 8 (Dkt. 6996). Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 8 response briefing.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar #8691) Butler Snow LLP 1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010 (601) 985-4561 william.gage@butlersnow.com

/s/ Susan M. Robinson

¹ The body of the Notice of Adoption refers to Dr. Gregory T. Bales, which appears to be a typographical error. Both the title of the Notice of Adoption and the docket references refer to Plaintiffs' Wave 8 Motion to Exclude Dr. Oz Harmanli.

Susan M. Robinson (W. Va. Bar #5169) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 24338 (304) 414-1800 srobinson@tcspllc.com

Counsel for Defendants Ethicon, Inc. and Johnson & Johnson

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage